

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate And Fee Changes, 1997

Docket No. R97-1

**INTERROGATORIES OF
ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS CARL DEGEN
(ANM/USPS-T12-1-7)
September 17, 1997**

Pursuant to sections 25 and 26 of the Commission's Rules of Practice, the Alliance of Nonprofit Mailers ("ANM") respectfully submits the attached interrogatories and requests for production of documents. Instructions for these questions appear in Appendix A.

ANM/USPS-T12-1

Please refer to your response to TW/USPS-T12-2, where you acknowledge that the MODS number and the observed activity may be inconsistent. What was the total number of tallies for which the recorded IOCS activity did not correspond to the MODS number for which the sample employee was clocked in?

ANM/USPS-T12-2

Please refer to your Attachment 1 to response to NAA/USPS-T12-2. For the years 1990-1995 please provide the total number of IOCS tallies, broken down by the number of (i) direct, (ii) mixed items, (iii) identified mixed containers, (iv) non-identified mixed containers and (v) not-handling tallies corresponding to the totals shown at the bottom of Attachment 1.

ANM/USPS-T12-3

Please refer to Attachment 1 to your response to OCA/USPS-T12-14. That attachment shows the following data entries for Bulk Nonprofit Other.

<u><i>MODS 1 and 2</i></u>	<u><i>Amount</i></u> <u><i>(BNP-Other)</i></u>
Express	107
Manp	181
Mecparc	369
Priority	169
Spbs Prio	108
Bus Reply	99
INTL	329
LD41	364
LD42	63
LD 48 Exp	14
LD 48 oth	503
LD48_SSV	31
LD 49	1,532
Registry	5
1 Bulk pv	449
1 SCAN	87

- (a) Please describe what each MODS operation listed here entails.
- (b) Please explain how and why Bulk Nonprofit Other is charged with costs for the MODS numbers shown.
- (c) Do such cost entries represent (i) actual tallies, (ii) the result of a distribution process such as LIOCAT, or (iii) something else?

ANM/USPS-T12-4

For Base Year 1996, what was total number of direct IOCS tallies for Standard A Regular Rate (a) automation and (b) presort categories?

ANM/USPS-T12-5

For Base Year 1996, what was total number of direct IOCS tallies for Standard A Nonprofit (a) automation and (b) presort categories?

ANM/USPS-T12-6

For Base Year 1996, what was the total number of direct IOCS tallies for Standard A Regular Rate ECR mail?

ANM/USPS-T12-7

For Base Year 1996, what was the total number of direct IOCS tallies for Standard A Nonprofit ECR mail?

Respectfully submitted,

A handwritten signature in cursive script that reads "David M. Levy/dch".

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September 17, 1997

INSTRUCTIONS

1. If the designated witness cannot answer a question, please redirect it to another witness who can.
2. If the requested data cannot be produced with reasonable effort in the exact format or level of detail requested, please produce all data available in (1) a substantially similar format or level of detail, or (2) susceptible to being converted to the requested format and detail.
3. The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimony, pamphlets, charts, tabulations, and workpapers. Documents also include information on computer media, microfilm and other non-paper media.
4. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. Workpapers shall include sufficient backup material to enable a third party to replicate the final results from the primary sources. Where arithmetic manipulations were performed by a computer with internally stored instructions, and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

David M. Levy/dm

September 17, 1997